UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)		
)		
V.)	Criminal No:	24-cr-10121-ADB
)		
)		
DANIEL LOUGHMAN, et al.,)		
)		
Defendants.)		

JOINT STATUS REPORT

Pursuant to Local Rule 116.5(a), the parties hereby file the following status report prepared in connection with the status conference scheduled for December 3, 2024.

(1) <u>Automatic Discovery/Pending Discovery Requests</u>

The Government has provided automatic discovery. The defendants are reviewing the discovery materials and deciding whether they will make additional discovery requests.

(2) <u>Additional Discovery</u>

The Government anticipates providing additional discovery, including discovery from individual recordings. The government does not anticipate providing further discovery, aside from the above-mentioned items, at this juncture, in the absence of a particular request by the defendant.

(3) <u>Timing of Additional Discovery Requests</u>

At this time, the government anticipates providing the additional discovery, including discovery from the above-mentioned items, within the next 30 days.

(4) <u>Protective Orders</u>

Assented-to protective orders have been submitted by the parties.

(5) <u>Pretrial Motions</u>

It is premature to decide whether the Defendant will file any pretrial motions under Fed. R. Crim. P. 12(b).

(6) Expert Discovery

The parties are still negotiating the ultimate deadlines for expert disclosures, the Government has proposed: that the government agrees to provide any expert witness disclosures 21 days prior to trial and that the Defendant agrees to provide any expert witness disclosures 14 days prior to trial.

(7) Speedy Trial Act

All of the time has been excluded from the defendant's initial appearance/arraignment through the date of the initial status conference scheduled for December 3, 2024. The parties request that the time be excluded until the interim status conference.

(8) Next Status Conference

Given all of the foregoing information, the parties request that the initial status conference, scheduled for December 3, 2024, be canceled. The parties request an interim status conference in approximately 30 to 45 days.

Respectfully submitted,

JOSHUA S. LEVY United States Attorney

By: /s/ John T. Dawley, Jr.
Assistant U.S. Attorney

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Dated: December 2, 2024

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing upon all counsel of record by electronic filing notice.

/s/ John T. Dawley, Jr.
Assistant U.S. Attorney

Dated: December 2, 2024